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UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

\$3,168,400.00 IN U.S. CURRENCY,
\$489,900.00 IN U.S. CURRENCY
FROM A SAFE DEPOSIT BOX AT
WILSHIRE STATE BANK, \$200,000.00
IN U.S. CURRENCY FROM A SAFE
DEPOSIT BOX AT BANK OF AMERICA,
\$138,401.14 IN BANK FUNDS FROM
WILSHIRE STATE BANK, 72 GOLD
BARS, AND 184 ASSORTED COINS,

Defendants.

GAIL CHOI AND YUNEE LEE ,

Claimants.

No. CV 17-05766-PA (AFMx)

**STIPULATION AND REQUEST TO DISMISS
ACTION PURSUANT TO RULE 41(a)(2)**

Pursuant to Federal Rule of Civil Procedure 41(a)(2), and by the
signatures of the parties and/or their counsel hereunder, plaintiff

1 United States of America and claimants Gail Choi and Yunee Lee
2 ("Claimants") hereby submit this stipulation and request to dismiss
3 the government's Verified Complaint for Forfeiture pursuant to
4 Federal Rule of Civil Procedure Rule 41(a)(2), with prejudice.

5 Claimants will and hereby do release the United States of
6 America, its agencies, agents, and officers, including employees and
7 agents of the Drug Enforcement Administration, as well as all agents,
8 officers, employees and representatives of any state or local
9 government or law enforcement agency involved in the investigation or
10 prosecution of this matter, from any and all claims, actions or
11 liabilities arising out of or related to the seizure and retention of
12 the defendant assets and/or this civil forfeiture action, including,
13 without limitation, any claim for attorneys' fees, costs or interest
14 that may be asserted on behalf of Claimants against the United
15 States, whether pursuant to 28 U.S.C. § 2465 or otherwise.

16 The defendant assets shall be returned to Claimants as follows:

17 1. \$74,754.99 plus interest actually earned thereon shall be
18 returned to claimant Yunee Lee within 30 days of the entry of the
19 order dismissing this matter, or Claimant's providing the government
20 with the bank information and personal identifiers necessary to
21 facilitate such payment under federal law, whichever is later; and

22 2. \$3,921,046.15, plus interest actually earned thereon, and
23 72 gold bars and 184 assorted coins shall be returned to claimant
24 Gail Choi within 30 days of the entry of the order dismissing this
25 matter or Claimant's providing the government with the bank
26 information and personal identifiers necessary to facilitate such
27 payment under federal law, whichever is later.

28 The parties stipulate and agree there was reasonable cause for
the seizure of the defendant assets and the institution of this

1 action as to said defendants. The order of dismissal shall be
2 construed as a certificate of reasonable cause pursuant to 28 U.S.C.
3 § 2465.

4 IT IS SO STIPULATED.

5
6 Dated: June 7, 2018

Respectfully submitted,

7 NICOLA T. HANNA
United States Attorney
8 LAWRENCE S. MIDDLETON
Assistant United States Attorney
9 Chief, Criminal Division
STEVEN R. WELK
10 Assistant United States Attorney
Chief, Asset Forfeiture Section

11
12 /s/ Jonathan Galatzan
JONATHAN GALATZAN
13 Assistant United States Attorney

14 Attorneys for Plaintiff
UNITED STATES OF AMERICA

15
16 Dated: June 7, 2018

LIMNEXUS LLP

17
18 /s/ by e-mail authorization
PIO S. KIM

19 Attorney for Claimant
GAIL CHOI

20
21 Dated: June 7, 2018

YUNEE LEE, pro se

22
23 /s/ by e-mail authorization
YUNEE LEE, pro se